
Status Summary of PCD Items (Completed, Ongoing, and/or Need Updating)

Section V.B – Legal Authority

- Par 10 (page 16): **COMPLETED and Ongoing**, submitted October 1, 2014 - Enter into formal legal agreements with the City to provide sufficient legal authority

Section V.C – Nine Minimum Controls

- Par 11 (page 17): **COMPLETED**, submitted August 10, 2015 – Prepare and submit an updated NMC Plan and Operation and Maintenance Manual
- Par 12 (page 28): **COMPLETED with Ongoing Implementation and Semiannual Update Reporting*** - Prepare and submit a series of annual progress updates and an evaluation of the efficacy of the implemented measures

Section V.D. – Minimum Control Measures – Stormwater Discharges

- Par 13 (page 29): **COMPLETED with Ongoing Implementation and Semiannual Update Reporting***, submitted October 1, 2014 and resubmitted September 16, 2017 – Prepare and submit an MS4 Individual Permit Application and implement the Minimum Control Measures

Section V.E. – Long Term Control Plan

- Par 14 (page 29): **COMPLETED** and submitted April 1, 2018 but was not approved and will be updated/revised – Complete and submit an acceptable LTCP that meets the requirements of the CSO Policy and Guidance
- Par 15 (page 30): **COMPLETED with Ongoing Implementation and Semiannual Update Reporting***, submitted July 1, 2013 with subsequent addendums – Prepare and submit an Initial Flow Metering and Monitoring Program Plan and implement the monitoring measures
- Par 16 (page 33): **COMPLETED**, submitted December 23, 2014 – Coordinate with EPA/DEP and evaluate and determine the LTCP Approach (Demonstration vs Presumptive) and Pollutants of Concern
- Par 17 (page 34): **COMPLETED Plan**, submitted July 29, 2015 but the WQ model was not fully implemented – Submit a Water Quality Model Plan and implement the approved plan
- Par 18 (page 34): **COMPLETED**, submitted April 1, 2016 – Submit a Financial Capability Analysis
- Par 19 (page 35): **COMPLETED**, submitted April 1, 2016 – Submit documentation identifying any sensitive or priority areas.
- Par 20 (page 35): **COMPLETED**, submitted July 29, 2015 – Submit a report providing a typical precipitation year analysis
- Par 21 (page 35): **COMPLETED**, submitted April 1, 2017 – Submit an Existing System Characterization Report

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- Par 22 (page 36): **COMPLETED**, submitted April 1, 2018 – Carry out an Alternatives Evaluation that complies with the CSO Policy and Guidance and include a knee-of-the-curve cost-performance analysis
 - Par 23 (page 39): **COMPLETED**, submitted April 1, 2018 – The LTCP shall include an analysis of the impact on environmental justice populations
 - Par 24 (page 40): **COMPLETED**, submitted April 1, 2018 but was not accepted and will be updated/revised – Submit to EPA/DEP a LTCP meeting a list of 10 specified requirements
 - Par 25 (page 41): **Ongoing Implementation** – Any significant revisions to the LTCP shall follow the procedures in Section XIX
 - Par 26 (page 41): **Ongoing Implementation** – Incorporate the approved LTCP into a legal enforcement mechanism

Section V.F. – Separate Sanitary Sewer Compliance

- Par 27 (page 41): **Ongoing Implementation and Semiannual Update Reporting***- Eliminate sanitary sewer overflows
- Par 28 (page 41): **Ongoing Implementation and Semiannual Update Reporting***– Report all occurrences of SSOs to PADEP
- Par 29 (page 42): **COMPLETED** – Satisfy the following compliance items for O&M and H&H model requirements and LTCP addressing Separate Sanitary Sewer areas.
 - OMM completed and submitted August 10, 2015
 - H&H Model Report completed and submitted April 1, 2016
 - LTCP completed and submitted April 1, 2018
- Par 30 (page 42): **COMPLETED**, Submitted Plan February 10, 2016 and updated February 2018, submitted report April 1, 2017– Submit a Capacity Assessment Plan for the Separate Sanitary Sewer System, carry out an engineering assessment for a specified range of design storms, inspect the Asylum and Spring Creek interceptors, submit a Capacity Assessment Report, and describe remedial measures necessary to address actual and predicted capacity constraints

Section V.G. – Ongoing Construction – Early Action Projects

- Par 31a (page 45): Perform a comprehensive assessment of the Front Street interceptor and identify priority remedial work
 - **COMPLETED**, submitted October 31, 2014 - Perform a comprehensive assessment of the structural integrity of the Front Street Interceptor
 - **COMPLETED**, submitted February 25, 2015, and amended March 2017 after cleaning was completed - Identify all priority remedial work in the Front Street Interceptor and develop a construction schedule – Scope was subsequently expanded to all CRW interceptors
 - **NOT COMPLETED - Ongoing Implementation and Semiannual Update Reporting*** - Complete all priority remedial work under the proposed construction schedule
 - CRW is currently determining and designing the required remediation measures for the Front Street and Paxton Creek Interceptors and continues to coordinate with the regulatory agencies

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- Par 31b (page 45): **COMPLETED with Ongoing Implementation and Semiannual Update Reporting***, submitted February 10, 2018 for original PCD list – Investigate and remediate sinkholes caused by structural deterioration of sewer systems
 - Par 31c (page 46): **COMPLETED Report with Ongoing Implementation and Semiannual Update Reporting*** report submitted February 10, 2016 – Investigate CSO outfall structures for defects, define priority remedial work, schedule and implement the required measures
 - Par 31d (page 46): **COMPLETED**, submitted Plan May 8, 2015, and submitted Report December 1, 2016 – Develop, submit, and implement a CSO Activation Monitoring Pilot (CAMP) Study to evaluate the efficacy of real-time information technologies

Section V.H. – General Compliance

- Par 32 (page 47): **Completed with Ongoing Implementation and Semiannual Update Reporting*-** Comply with all final effluent limits in the NPDES permit and complete the specified AWTP upgrades
 - **COMPLETED** February 15, 2014 - Issue notice to proceed for the construction of AWTF upgrades
 - **COMPLETED**, various quarterly dates - Submit quarterly Construction Progress Reports
 - **COMPLETED**, April 29, 2016 - Complete all construction
- Par 33 (page 48): **Ongoing Implementation and Semiannual Update Reporting***: Report all dry weather overflows to PADEP, implement corrective action, and summarize occurrences in the Semi-Annual Report.
- Par 34 and 35 (page 49): **Ongoing Implementation and Semiannual Update Reporting***: Report all occurrences of Unauthorized Releases to PADEP and implement corrective action
- Par 36 (page 49): **Ongoing Implementation and Semiannual Update Reporting***: Report anticipated and unanticipated non-compliance with the NPDES Permit

Section V.I. – Review and Approval of Deliverables

- Par 37 thru 41 (page 50): **COMPLETED with Ongoing Implementation and Semiannual Update Reporting*** – Meet the list of specified requirements for each submitted plan or report

Section VII.A. – Reporting Requirements

- Par 42 thru 44 (page 53): **COMPLETED with Ongoing Implementation and Semiannual Update Reporting*** – On a semi-annual basis submit written status reports of the progress in implementing the PCD, including the Chapter 94 Report Semi

***Note:** Semiannual Reports are submitted on March 31 for update items occurring through December 31 and are submitted on March 31, 2020 for update items occurring through December 31. A Semiannual report was submitted on March 31, 2020 for update items occurring through December 31, 2019, and September 30, 2020 for update items occurring through June 30, 2020.